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Volume I  
Pages 1-40  
Exhibits 1

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

- - - - -x  
ARLENE REED, STEVEN McDERMOTT :  
and STACEY McDERMOTT, :  
 :  
Plaintiffs, :  
 :  
Vs. : Civil Action  
 : No. 04CV-12253  
 : MLW  
FEDEX GROUND PACKAGING :  
SYSTEMS, INC., and T.S. PRUITT, :  
 :  
Defendants. :  
- - - - -x

DEPOSITION OF ARLENE REED, a witness called  
on behalf of the Defendant, taken pursuant to the  
Federal Rules of Civil Procedure, before Melvin  
Gross, Registered Professional Reporter and Notary  
Public in and for the Commonwealth of Massachusetts,  
at the Law Offices of Joseph A. Antonellis, 280  
Main Street, Milford, Massachusetts 01757 on  
Wednesday, November 15, 2006, commencing at 2:00  
p.m.

1 Q. Prior to the accident, did Steven McDermott  
2 have any other accidents while working for  
3 Truckadyne?

4 A. Not that I know of, no.

5 Q. Did he ever receive any speeding tickets,  
6 or...

7 A. Not that I know of.

8 Q. Do you know if he was ever disciplined for  
9 any reason by your company?

10 A. No.

11 Q. Did he receive any training?

12 A. No. With the new CDL licenses, we are not  
13 required to train anymore.

14 Q. So he had already received some training in  
15 whatever standards were applicable?

16 A. Yes.

17 Q. If you turn two pages past the one we were  
18 just looking at -- the last page we were looking at  
19 was the "Examination Report," two pages past that is  
20 a document whose title is, "Newport Alliance."

21 A. Yes.

22 Q. Can you tell me if you recognize this  
23 document?

24 A. Yes, I do.

1 Q. Can you tell me what it is?

2 A. You are required, if there is an accident  
3 when a vehicle is towed, or there's an injury, you  
4 have to have a post-accident drug screen. That's  
5 Department of Transportation law. And he had it  
6 done within the twenty-four-hour period.

7 Q. And what is this document here?

8 A. It's just saying that he was tested. This  
9 is a copy of the invoice stating that he had the  
10 drug and alcohol test done.

11 Q. Do you know where he had the drug test  
12 done?

13 A. You know, I don't know if he had it done in  
14 Rhode Island, or if he had it done in Pennsylvania.  
15 Because sometimes you have them done and then they  
16 go to another hospital for analysis. So, I'm not  
17 sure. I think he had it done in Pennsylvania before  
18 he came home. But I'm not sure.

19 Q. Just because it's not in here, would you  
20 happen to know what the results of the tests were?

21 A. He was negative on both.

22 Q. And then finally, this is probably the last  
23 page I'm going to ask you about on this and then  
24 I'll move on, it's three pages later. There's